

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval to Recover Deferred)
Costs for Big Wind Implementation)
Studies through the Renewable)
Energy Infrastructure Program)
Surcharge.)

DOCKET NO. 2011-0112

PUBLIC UTILITIES
COMMISSION

2012 JAN 20, P 1:25

FILED

INTERVENOR COUNTY OF MAUI'S RESPONSE TO DIVISION OF
CONSUMER ADVOCACY'S INFORMATION REQUESTS TO COUNTY
OF MAUI DATED JANUARY 6, 2012

AND

CERTIFICATE OF SERVICE

DEPARTMENT OF THE CORPORATION COUNSEL 205

PATRICK K. WONG 5878
Corporation Counsel
MICHAEL J. HOPPER 8568
Deputy Corporation Counsel
County of Maui
200 South High Street
Wailuku, Maui, Hawaii 96793
Telephone: (808) 270-7740
Attorneys for Intervenor
COUNTY OF MAUI

BEFORE THE PUBLIC UTILITIES COMMISSION

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HAWAIIAN ELECTRIC COMPANY, INC.) DOCKET NO. 2011-0112
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INTERVENOR COUNTY OF MAUI'S RESPONSE TO
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REQUESTS TO COUNTY OF MAUI DATED JANUARY 6, 2012

Response to Instructions

1. Douglas P. McLeod, J.D., County of Maui Energy Commissioner prepared these responses and is expected to act as a witness.

2. N/A.

3. Objection. County of Maui objects to this instruction as (a) it asks us to assume that specific words do not have their usual and customary meaning; and (b) the word "used" is unnecessarily broad and confusing and is not limited to sources upon which we rely or consider accurate.

Without waiving objections to the definitions, we note that we are not withholding any responsive documents on grounds of privilege.

Response to Information Requests

CA/COM-IR-1 Ref: COM's SOP

- a. Exhibit 11, pages 13, 14, 16, and 17. Exhibit 12, pages 13, 14, and 15. Exhibit 13, pages 12-25. Exhibit 14, pages 3, 27-31, Exhibit 15, page 12. Exhibit 16, pages 2, 4, 5, 34, 35, and 36-40. Exhibit 17, pages 34, and 70-98. Exhibit 18, page 20.
- b. Our position is that these costs are not "reasonable" because they are not an evaluation of alternatives to Big Wind; they are merely sub-choices once an overall decision has been made to proceed with Big Wind. As far as what the Commission "expected", we will let the Commission's words speak for themselves: "comparable evaluation of other options to that which it conducts for Big Wind". *Order Granting Life of the Land's Motion to Intervene 7/6/2011 (Docket No. 2011-0112)*, at 2. Our point is that an insignificant amount of the total costs went to consider alternatives to Big Wind, and therefore it was unreasonable to seek recovery of the TCRPS at the present time because the alternatives considered in the TCRPS were not alternatives to Big Wind, they were merely alternatives **within** Big Wind.

CA/COM-IR-2 Ref: COM's SOP

Item by item response on the Statement of Issues

1. Only the OWITS costs of \$ 3,169,940, not the TCRPS costs of \$ 743,012.
2. We agree with the CA that a 3 year recovery period for a surcharge appears reasonable.
3. HECO has not been able to calculate this amount as there is no proposal acceptable to the community. The cost of the current unacceptable proposal is approximately \$1 billion.
4. No. It is not reasonable. On a pure cost analysis that uses a very narrow window of time to exclude geothermal and ignores opposition to the proposed level of community benefits, it looks cost effective compared to oil fired generation.

CA/COM-IR-3 Ref: COM's SOP

1. We do not have an opinion as to the proper sizing of all "legs" of a cable system.

CA/COM-IR-4 Ref: COM's SOP

- a. \$3,912,952
- b. The County disagrees with submitting these costs for recovery before the required comparable analysis has been performed. This engineering work will be needed once a decision has been made to implement Big Wind. Our point is

that HECO continued to pour money into ever more detailed analysis of the specific routing for Big Wind without doing similar work for other options. By way of example, and without limitation, we note that HECO was willing to update the production figure from the proposed windfarms (raising the capacity factor from 30% to 42%) when comparing Big Wind to solar in Exhibit 21, but never did reduce the solar cost built into its model below \$7.10/watt despite the collapse in solar prices.

Exhibit 21, page 5 is another example of how things are not comparable. "Hawaiian Electric has worked with its consultant Papay Quayle Resources, LLC to conduct an economic sensitivity analysis of the cost of Big Wind."

Id. Where is the work by Papay Quayle on the other alternatives?

- c. Exhibit 21 is an undated document without a named author. The answer to your request to confirm is that we cannot confirm this point. Page 9 of Exhibit 21 states that the four scenarios are "different than the Big Wind Stage 1 study modeling scenarios". On the same page it goes on to say that "[t]he RPS analysis does not include a comparison of costs associated with the renewable resources assumed to be common in all of the scenarios". *Id.* The County of


Maui's position is that Exhibit 21 does not exhibit the required "comparable analysis" of alternatives.

CA/COM-IR-5 Ref: COM's SOP

The County believes that the timing should be per the IRP process.

DATED: Wailuku, Maui, Hawaii, January 19, 2012.

PATRICK K. WONG
Corporation Counsel
Attorney for Intervenor
COUNTY OF MAUI

By 
MICHAEL J. HOPPER
Deputy Corporation Counsel

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

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Surcharge.)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the
foregoing document was duly served on January 19, 2012, via
electronic e-mail, upon the following parties:

Dean K. Matsuura
Manager, Regulatory Affairs
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawaii 96840-0001
Dean.matsuura@heco.com

Henry Q. Curtis
Vice-President for Consumer Issues
Life of the Land
76 North King Street, Suite 203
Honolulu, Hawaii 96817
Henry.lifeoftheland@gmail.com

Jeffrey T. Ono
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
335 Merchant Street, Room 326
Honolulu, Hawaii 96813
jeffrey.t.ono@dcca.hawaii.gov

DATED: Wailuku, Maui, Hawaii, January 19, 2012.

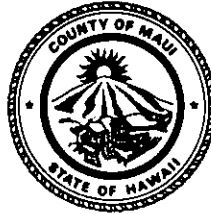
PATRICK K. WONG
Corporation Counsel
Attorney for Intervenor
COUNTY OF MAUI

By



MICHAEL J. HOPPER
Deputy Corporation Counsel

ALAN M. ARAKAWA
Mayor



PATRICK K. WONG
Corporation Counsel

DEPARTMENT OF THE CORPORATION COUNSEL
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE: (808) 270-7740 FAX 270-7152

January 19, 2012

FILED
2012 JAN 20 P 1:24
PUBLIC UTILITIES
COMMISSION

TO: Clerk
Public Utilities Commission
465 South King Street, #103
Honolulu, Hawaii 96813

FROM: Michael J. Hopper, Deputy Corporation Counsel MJH/ma

SUBJECT: In the Matter of the Application of Hawaiian Electric Company, Inc., for
Approval to Recover Deferred Costs for Big Wind Implementation Studies
through the Renewable Energy Infrastructure Program Surcharge, Docket No.
2011-0112

TRANSMITTED IS/ARE THE FOLLOWING:

COPIES	DATE	DESCRIPTION
Original + 1 copy		Intervenor County of Maui's Response to Division of Consumer Advocacy's Information Requests to County of Maui dated January 6, 2012; Certificate of Service

- | | |
|---|---|
| <input type="checkbox"/> For your information & files | <input type="checkbox"/> For your review and approval |
| <input type="checkbox"/> For approval & signature | <input type="checkbox"/> See REMARKS below |
| <input type="checkbox"/> Per your request | <input checked="" type="checkbox"/> For filing |

REMARKS: Please send us a file-marked copy of above document for our files in the enclosed self-addressed stamped envelope. Thank you.

MJH:ma
Enclosures